

**In The Matter Of:**



**COPY**

*Klug v.*

*Marshall University Board of Governors*

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*Debra Hart*

*February 17, 2020*

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1 answer.

2 THE WITNESS: The Office of Equity Programs

3 would refer to Policy No. GA-1. That is the policy that we

4 follow for any complaints relevant to sexual harassment,

5 unwanted sexual advances, requests for sexual favors, denied

6 opportunities, as listed in GA-1.

7 BY MS. WHITEAKER:

8 Q Okay. And if somebody at the School of

9 Medicine is aware of complaints of the nature that are on

10 Page 2 of Exhibit 5, a responsible employee would have a duty

11 to report those to you, correct?

12 MR. OXLEY: Objection. Go ahead and

13 answer.

14 THE WITNESS: Yes.

15 BY MS. WHITEAKER:

16 Q The third page of this talks about a

17 Behavioral Integrity Committee. Are you familiar with that

18 committee?

19 A I am not familiar with that committee other

20 than what I've read. I'm not a member of the committee.

21 Q Okay. Do you work with that committee at

22 all?

23 A Directly, no.

24 Q You were describing for me the procedures you

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1 follow for a complaint, and I was wondering if you had a

2 document, like a flow chart or something, that shows the

3 procedure process?

4 A Currently, yes.

5 Q Did you just develop that recently?

6 A It's been effective with the 2018 GA-1.

7 Q Before that, did you have any type of a flow

8 chart type thing that showed how it goes?

9 A Flow chart, no. And I wouldn't consider the

10 handout a flow chart. It identifies the process as it is

11 defined in GA-1, but flow chart, no.

12 Q Okay. Prior to 2017, did you have any sort

13 of document that you would provide to complainants describing

14 the process in any more detail than what is in GA-1?

15 MR. OXLEY: Objection to form. Go ahead and

16 answer the question.

17 THE WITNESS: Our complaint process is

18 available online, detailed. It asks questions that you

19 answer.

20 BY MS. WHITEAKER:

21 Q Online where?

22 A On the equity web page.

23 Q Was it part of the complaint form?

24 A Yes.

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1 Q You would investigate complaints if they

2 were made by members of the faculty, too, wouldn't you?

3 A Yes.

4 Q How do you ensure that the School of Medicine

5 is complying with the Title IX policy?

6 MR. OXLEY: Objection to form. Go ahead and

7 answer the question.

8 THE WITNESS: Could you be more specific

9 with the question?

10 BY MS. WHITEAKER:

11 Q Yes. You told me before that you take a

12 proactive approach, and I know that you keep track of

13 complaints and things like that. How do you ensure that the

14 School of Medicine, in particular, is following the Title IX

15 policies that you have?

16 A We have an online training program that's

17 been made available to all faculty and all staff and all

18 students that are paid, and the School of Medicine is actually

19 a – they're part of the process that assists us in

20 administering that program.

21 Our training that will come out this year

22 will even have the dean's signature, along with the president

23 and general counsel, to ensure that all members of Marshall

24 faculty and staff and students understand that this training

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1 is available, and the importance of understanding federal

2 law.

3 Q Okay. Prior to that, how did you make sure

4 that everyone understood the importance of it?

5 A We would contact the school to determine –

6 if we received a request for training, they may ask for a

7 department, and we might consider or ask are there other

8 departments. And we've had the training in place for quite

9 some time.

10 Q How did you make sure that the trainings were

11 happening?

12 A Documentation follow-up.

13 Q Do you keep documentation of who completed

14 the online training?

15 A That was maintained through our office, and

16 it is up to date from the previous year. Obviously, we don't

17 keep it for – once it's updated, we'll have 2017, 2018, 2019.

18 And once the company merged, those records were no longer

19 available.

20 Q When you were tracking them, let's say 2015

21 or 2016, it doesn't matter, if you were tracking them, did

22 you do anything if you saw, you know, ten people haven't done

23 this training in the School of Medicine?

24 A Yes. Friendly reminder notices were

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<p>1 Q Do you know when it was revised before that?</p> <p>2 A I would like to look at the date.</p> <p>3 Q Does it have a revised date on it somewhere?</p> <p>4 A Yes.</p> <p>5 Q Is that something you could look for?</p> <p>6 A Yes.</p> <p>7 Q Okay.</p> <p>8 MR. OXLEY: If we could take a break here in</p> <p>9 just a few minutes.</p> <p>10 MS. WHITEAKER: We can do it right now.</p> <p>11 (WHEREUPON, a recess was taken.)</p> <p>12 MS. WHITEAKER: Back on the record after a</p> <p>13 short break.</p> <p>14 BY MS. WHITEAKER:</p> <p>15 Q Would you look at Exhibit No. 3, please?</p> <p>16 A Three?</p> <p>17 Q Yes, ma'am.</p> <p>18 A Yes.</p> <p>19 Q Section 4, which is 9 of 12, I think you told</p> <p>20 me that this is the procedure that you use?</p> <p>21 A Yes.</p> <p>22 Q And it says at 4.22, it talks about</p> <p>23 responsible employees. And then right above that, 4.21, it</p> <p>24 says, "Responsible employees must report incidents of</p>	<p>1 Q Yes. Is the filing of the complaint under</p> <p>2 this policy considered protected activity?</p> <p>3 A What is your definition of protected?</p> <p>4 Q Something that you can't be retaliated</p> <p>5 against for doing.</p> <p>6 MR. OXLEY: Objection. Go ahead and answer</p> <p>7 if you can.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MS. WHITEAKER:</p> <p>10 Q Do you provide any information to a</p> <p>11 complainant about retaliation?</p> <p>12 MR. OXLEY: Objection to form. Go ahead and</p> <p>13 answer.</p> <p>14 THE WITNESS: Yes. It's in the policy and</p> <p>15 procedures.</p> <p>16 BY MS. WHITEAKER:</p> <p>17 Q Anything specific that you would give to a</p> <p>18 complainant about retaliation or just explaining that they</p> <p>19 should not be retaliated against?</p> <p>20 MR. OXLEY: Objection to form. Go ahead and</p> <p>21 answer.</p> <p>22 THE WITNESS: All complainants and</p> <p>23 respondents receive the entire administrative policy and</p> <p>24 procedures, and there is a section on retaliation.</p>
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<p>1 prohibited conduct to the Title IX coordinator." Right?</p> <p>2 A Yes.</p> <p>3 Q Under "Responsible Employees," it mentions</p> <p>4 deputy Title IX coordinators and I notice at the top of this,</p> <p>5 4.1, it says that deputy coordinators can be appointed. I</p> <p>6 just want to make sure we're clear on this. The university</p> <p>7 or you have never appointed any deputy coordinators; is that</p> <p>8 right?</p> <p>9 MR. OXLEY: Objection to form. Go ahead and</p> <p>10 answer.</p> <p>11 THE WITNESS: Correct.</p> <p>12 BY MS. WHITEAKER:</p> <p>13 Q "'Responsible Employees' are employees in a</p> <p>14 leadership or supervisory position, or who have significant</p> <p>15 responsibility for the welfare of students or employees." Is</p> <p>16 that the correct definition?</p> <p>17 A Yes.</p> <p>18 Q The filing of a complaint is considered</p> <p>19 protected conduct, right?</p> <p>20 MR. OXLEY: Objection. Go ahead and answer</p> <p>21 that question.</p> <p>22 BY MS. WHITEAKER:</p> <p>23 Q Protected activity? Is it?</p> <p>24 A Could you state the question again?</p>	<p>1 BY MS. WHITEAKER:</p> <p>2 Q Okay. Is that that same booklet you</p> <p>3 mentioned to me that the advisors and leaders would get?</p> <p>4 MR. OXLEY: Objection to form. Go ahead and</p> <p>5 answer.</p> <p>6 THE WITNESS: Yes.</p> <p>7 BY MS. WHITEAKER:</p> <p>8 Q Retaliation against a complainant is</p> <p>9 prohibited, correct?</p> <p>10 A Yes.</p> <p>11 Q Do the administrative procedures you</p> <p>12 mentioned also talk about the procedures related to</p> <p>13 disability complaints?</p> <p>14 MR. OXLEY: Objection to form. Go ahead and</p> <p>15 answer if you can.</p> <p>16 THE WITNESS: Yes.</p> <p>17 BY MS. WHITEAKER:</p> <p>18 Q And just like sex discrimination complaints,</p> <p>19 responsible employees are supposed to report disability</p> <p>20 discrimination also; is that right?</p> <p>21 MR. OXLEY: Objection to form. Go ahead and</p> <p>22 answer.</p> <p>23 THE WITNESS: They can report that to the</p> <p>24 Title IX coordinator, myself, director of equity programs,</p>

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1 and to the director of human resources.  
2 BY MS. WHITEAKER:  
3 Q And they must do that, under the policy, if  
4 they're aware of a discrimination allegation, right?  
5 MR. OXLEY: Objection to form. Go ahead and  
6 answer if you can.  
7 THE WITNESS: Yes.  
8 BY MS. WHITEAKER:  
9 Q When is the first time you became aware of  
10 complaints that Dr. Klug had regarding discriminatory  
11 treatment?  
12 MR. OXLEY: Objection to form. Go ahead and  
13 answer if you can.  
14 THE WITNESS: When she sent me an e-mail to  
15 request – well, she sent me an e-mail to request a meeting.  
16 (WHEREUPON, Hart Deposition  
17 Exhibit No. 6, Office of Equity  
18 Complaint Form, was marked for  
19 identification.)  
20 BY MS. WHITEAKER:  
21 Q I'm going to give you Exhibit No. 6, and this  
22 is a document, the first page of it says, "Office of Equity  
23 Program Complaint Form." I know you mentioned an e-mail.  
24 Is this the document that was e-mailed to you, or was it

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1 was about and whether or not it was a responsibility under  
2 Equity Programs or Title IX.  
3 Q Okay. Tell me about that assessment.  
4 A I can tell you that. There was inclement  
5 weather that day, so we communicated about whether or not we  
6 were both going to be able to make the meeting and confirmed  
7 at that time that we both could make the meeting.  
8 I'm sharing the truth, as I'm under oath to  
9 do so. Dr. Klug was visibly upset during the time of our short  
10 meeting and wasn't able to articulate all of the information  
11 that I needed to determine whether or not it was Title IX or  
12 an equity issue.  
13 Q Was anybody else in the meeting that you had  
14 with Dr. Klug?  
15 A No, not that I can recall.  
16 Q The written narrative that she provided goes  
17 right up to February of 2016, doesn't it?  
18 Q Did you answer me? I'm sorry.  
19 A You asked me did I see it up to February 2016?  
20 Q Does it go up -  
21 A Yes, it does.  
22 Q The narrative goes up through 2016?  
23 A February 2016, correct.  
24 Q So when you said it ended at 2014, are you

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1 something else?  
2 A This is the document.  
3 Q Okay. And when it was e-mailed to you, did  
4 you get all of these pages? There's a cover page form and  
5 then there's three pages after that with detailed  
6 allegations.  
7 A I believe so.  
8 Q And the date on this form on the front, it  
9 says February 17, 2016?  
10 A Yes.  
11 Q Is that the date you received it?  
12 A Yes.  
13 Q When you received this complaint form, what  
14 did you do?  
15 A Well, I immediately identified that the date  
16 of the last incident was 6/20/2014. If alleged  
17 discrimination is continuing, no. And the complainant in  
18 this particular complaint form marks "Other." So my  
19 responsibility included to determine what is this complaint,  
20 what happened, what is it about, is it Title IX, is it a  
21 grievance, what is it.  
22 Q Right. So how did you establish that?  
23 A Dr. Klug scheduled a meeting to have what I  
24 call an assessment and intake to determine what the complaint

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1 just talking about the date that she wrote on the cover?  
2 A The date on the report. Alleged incident  
3 discrimination took place on or about 2014.  
4 Q Okay. And then you said she marked "No"  
5 under continuing?  
6 A Correct.  
7 Q And "Other." Is it unusual for complainants  
8 not to understand exactly how to fill out these forms?  
9 MR. OXLEY: Objection.  
10 THE WITNESS: I can't answer that question  
11 simply because complainants have the responsibility to  
12 articulate the alleged incident to give us the message to tell  
13 us what's happened. And as I indicated earlier, Dr. Klug was  
14 visibly upset and we certainly had enough time. I shared with  
15 her, too, if there's other information she wanted to share  
16 with me to please do so when she felt better.  
17 BY MS. WHITEAKER:  
18 Q Okay. And what did you guys talk about  
19 during the short meeting?  
20 A We talked about counseling because she – I  
21 actually left the room to get a box of tissues because she  
22 was upset.  
23 Q Did she bring any other materials to you  
24 other than what you already had with the complaint form and

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1 the attached narrative?

2 A Not that were presented to me.

3 Q Did you take all the pages of this complaint

4 form together when you were looking at it?

5 A In all honesty, I believe so, but I spent most

6 of my time concerned about the state that Dr. Klug was in.

7 And it's common for complainants and respondents to come in

8 and they are upset, and our first goal is to ensure that

9 counseling services are made available.

10 I'm not a clinical psychologist or a

11 counselor, so I always make sure that they are going to be

12 okay. And a lot of times we wait to make sure that they have

13 a chance to settle down a little bit and kind of regroup, and

14 they may even come back for another meeting with additional

15 information.

16 Q Right. At that point did you assign an

17 advisor to her?

18 A I did not. There was nothing on the form

19 that indicated this was a Title IX complaint.

20 Q Okay. What about her narrative, did you

21 find anything in there that made you think it was a Title IX

22 complaint?

23 A In my initial overview, it appeared to be a

24 personnel issue, human resources.

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1 Q Okay. Did you change your view of that at

2 any time?

3 A No.

4 Q Did you speak to anybody else about her

5 complaint?

6 A My expectation was that Dr. Klug was going

7 to get back with other information when she was in a better

8 state.

9 Q Okay. Did you get an investigator involved

10 at any time?

11 A No.

12 Q Did Dr. Klug get back in touch with you?

13 A I didn't hear any more from her.

14 Q Okay. Did you contact Dr. Klug?

15 A Only in - I would have to look at the e-mail

16 to determine, but no. The next correspondence or

17 communication I received was from the department.

18 Q And what was that?

19 A That they had worked out a plan of action to

20 accommodate the request made in the complaint form.

21 Q Who did you talk to?

22 A I had a brief conversation, an e-mail from

23 Donna Webb.

24 Q Was it an e-mail or conversation?

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1 A E-mail.

2 Q E-mail. Any other communication that you

3 had with the School of Medicine regarding Dr. Klug?

4 A No.

5 Q Did you ever open any type of investigation

6 for Dr. Klug?

7 A No.

8 Q And just to make sure we're clear, other than

9 this complaint that we're talking about here, you never

10 received any other complaints either from Dr. Klug or on Dr.

11 Klug's behalf any time prior to this?

12 A No.

13 MR. OXLEY: Objection to form.

14 (WHEREUPON, Hart Deposition

15 Exhibit No. 7, Letter dated

16 3/18/16, was marked for

17 identification.)

18 BY MS. WHITEAKER:

19 Q Let me show you a document. This one is

20 marked Exhibit No. 7 to your deposition, and it is a letter

21 dated March 18, 2016, from Dr. Mozaffari to Dr. Klug. Have

22 you seen this letter before (indicating)?

23 A (Witness examines document.) I don't

24 recall. Yes, I think so.

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1 Q It looks like you were copied in on it at the

2 bottom. I think your name was misspelled, but at least it

3 appears your name is at the bottom.

4 A Yes, I see it.

5 Q Okay. Do you recall specifically what was

6 in the e-mail from Donna Webb?

7 MR. OXLEY: Objection to form. Go ahead and

8 answer if you can.

9 THE WITNESS: Yes.

10 BY MS. WHITEAKER:

11 Q What was it?

12 A She is - a copy of this letter (indicating)?

13 Is that what you're speaking of?

14 Q I don't know. I'm asking you what Donna Webb

15 sent you. And if I'm -

16 A This is the document (indicating).

17 Q Okay. Did Dr. Mozaffari or anyone with the

18 School of Medicine consult with you about this resolution?

19 A No.

20 Q Did you talk to Dr. Klug after this to see

21 if it was satisfactory to her?

22 A I did not speak to Dr. Klug again. I had no

23 information that this was a Title IX complaint. And it

24 appeared in the correspondence that they were accommodating



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<p>1 Q Okay. And where is that located?</p> <p>2 A In the Department of Human Resources.</p> <p>3 Q Is it a written plan that we could look at?</p> <p>4 A Yes.</p> <p>5 Q And where do we find it?</p> <p>6 A The director of human resources houses that</p> <p>7 plan. And let me say it's done in a variety of ways:</p> <p>8 recruiting, and we are looking at retention. There's a lot</p> <p>9 in the plan.</p> <p>10 Q In the affirmative action plan?</p> <p>11 A Yes, and our recruiting resources.</p> <p>12 Q Are you involved in recruiting at the School</p> <p>13 of Medicine?</p> <p>14 A I think every faculty and staff member at the</p> <p>15 university is directly involved with recruiting. Yes, I am</p> <p>16 involved in recruiting.</p> <p>17 Q Does that all go through HR?</p> <p>18 MR. OXLEY: Objection to form. Go ahead and</p> <p>19 answer the question.</p> <p>20 THE WITNESS: Yes.</p> <p>21 BY MS. WHITEAKER:</p> <p>22 Q How are you involved with HR?</p> <p>23 A I oversee the hiring process for the</p> <p>24 university.</p>	<p>1 go back to it to clarify that.</p> <p>2 BY MS. WHITEAKER:</p> <p>3 Q I would like to know if you have involvement</p> <p>4 or oversight with regard to the selection of graduate students</p> <p>5 or residents for the programs?</p> <p>6 A No.</p> <p>7 Q What about for faculty serving in programs,</p> <p>8 particularly at the School of Medicine?</p> <p>9 A The decision in hiring them?</p> <p>10 Q Yes.</p> <p>11 A No.</p> <p>12 Q Do you think you should have a role in that?</p> <p>13 A That's a hypothetical question that I can't</p> <p>14 answer. I don't know. I mean that's not part of my</p> <p>15 responsibility.</p> <p>16 Q Whose job is it? Is there anyone who has the</p> <p>17 job to ensure that there's equity in those selections?</p> <p>18 A Yes. We have search committees that make</p> <p>19 the decision for all hires, individual hires.</p> <p>20 Q And what about for graduate students and</p> <p>21 medical residents?</p> <p>22 A I'm not familiar extremely with that</p> <p>23 process. I don't know that process.</p> <p>24 Q Is there any assessment that you have done</p>
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<p>1 Q Okay. So does HR report to you?</p> <p>2 A No, we work cooperatively together to ensure</p> <p>3 that we're identifying available candidates, that the pool</p> <p>4 of eligible candidates is diverse by gender, ethnicity, et</p> <p>5 cetera.</p> <p>6 Q Does that also go into graduate programs like</p> <p>7 selecting graduate students, residents, things like that?</p> <p>8 MR. OXLEY: Objection to form. Go ahead and</p> <p>9 answer.</p> <p>10 THE WITNESS: I can't answer that question.</p> <p>11 BY MS. WHITEAKER:</p> <p>12 Q Do you have any oversight over the</p> <p>13 different –</p> <p>14 A The GA positions?</p> <p>15 Q Yes, diversity with regard to graduate</p> <p>16 schools and medical schools?</p> <p>17 A No.</p> <p>18 MR. OXLEY: Objection. I don't want to</p> <p>19 intervene, but the reason I'm – the first of my objections,</p> <p>20 I was confused about whether or not you're talking about</p> <p>21 hiring people for those positions or admitting students. And</p> <p>22 that question, the way it was phrased, I could not</p> <p>23 differentiate between the two.</p> <p>24 MS. WHITEAKER: Okay, fair enough. So I'll</p>	<p>1 to determine the culture of the School of Medicine, so far</p> <p>2 as it is equitable for gender? Is it welcoming to people with</p> <p>3 different disability statuses? Have you done any sort of</p> <p>4 analysis of that?</p> <p>5 MR. OXLEY: Objection. Go ahead and answer</p> <p>6 that question if you can.</p> <p>7 THE WITNESS: I don't conduct any assessment</p> <p>8 from my office that would reveal any climate survey for any</p> <p>9 department.</p> <p>10 BY MS. WHITEAKER:</p> <p>11 Q Okay. Why not?</p> <p>12 A That's not part of my responsibility, and I</p> <p>13 don't know. If there's an issue or a concern that we need</p> <p>14 assistance in a specific area or a point of specificity is</p> <p>15 defined for us to respond to, we do that, but no, not overall.</p> <p>16 Q Part of your position is to prevent</p> <p>17 discriminatory environments, correct?</p> <p>18 A Correct, yes.</p> <p>19 Q But how is it that you do that, other than</p> <p>20 I know, of course, you've mentioned the online training and</p> <p>21 the seminars or workshops that you do? But is there anything</p> <p>22 else that you're doing?</p> <p>23 MR. OXLEY: Objection to form. Go ahead and</p> <p>24 answer if you can.</p>

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<p>1 THE WITNESS: We don't have a way to identify</p> <p>2 concerns unless a faculty, staff, or student would notify our</p> <p>3 office to say that there are issues or problems. And when</p> <p>4 we're notified of such, then we respond to that.</p> <p>5 And just like everyone who visits the Office</p> <p>6 of Equity Programs is coming because they have a complaint</p> <p>7 that they will articulate as Title IX or a grievance. They've</p> <p>8 been denied residency or there's a grievance that they're</p> <p>9 filing. So we're not – we don't solicit to say tell me what's</p> <p>10 going on in your area or defining a trend.</p> <p>11 BY MS. WHITEAKER:</p> <p>12 Q Okay. Today one of the documents you</p> <p>13 brought with you is this Title IX summary and this has dates</p> <p>14 for the – it looks like it's January 2018 through November</p> <p>15 2019.</p> <p>16 A Yes.</p> <p>17 Q Is this something that you do every year? Or</p> <p>18 how often do you do this?</p> <p>19 A We have at least provided this for the last</p> <p>20 two years.</p> <p>21 Q Okay. Before that, did you do something</p> <p>22 similar?</p> <p>23 A Not as detailed, no.</p> <p>24 Q Who do you prepare this chart for?</p>	<p>1 A Office of the General Counsel.</p> <p>2 Q And how many years have you been doing the</p> <p>3 end-of-year report?</p> <p>4 A The last three years.</p> <p>5 Q Did you do it in 2016?</p> <p>6 A No.</p> <p>7 Q In 2016, did you do anything similar?</p> <p>8 A No.</p> <p>9 Q So if you wanted to figure out how many</p> <p>10 complaints we had in 2016, what would you do?</p> <p>11 A Manually review the files that we have in our</p> <p>12 office.</p> <p>13 Q Are the files in your office organized by</p> <p>14 date?</p> <p>15 A Yes.</p> <p>16 Q So it wouldn't be that hard to go back to the</p> <p>17 2016 or the 2015?</p> <p>18 A 2016, yes.</p> <p>19 Q Well, 2015, same thing?</p> <p>20 A I think so.</p> <p>21 Q Do you only have them back so far?</p> <p>22 A I'm sure I have the last four years.</p> <p>23 Q Okay. Are there records retention policies</p> <p>24 under Title IX or some of these other policies you have about</p>
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<p>1 A The Office of General Counsel receives this</p> <p>2 on a weekly basis, depending on, of course, the time period.</p> <p>3 The Office of the President receives this at least quarterly</p> <p>4 to know what's going on, on the campus.</p> <p>5 Q Is there anything on this document that is</p> <p>6 going to show whether the complaints are substantiated or not</p> <p>7 or what the outcomes were?</p> <p>8 A Not on this form, no.</p> <p>9 Q Is there a different form where you show</p> <p>10 that?</p> <p>11 A The outcome?</p> <p>12 Q Yes.</p> <p>13 A We have accessibility to it, but no, it's not</p> <p>14 defined on this form.</p> <p>15 Q You have accessibility to what?</p> <p>16 A To determine the outcome. We're fully aware</p> <p>17 of all the outcomes.</p> <p>18 Q But do you ever put it together on a chart</p> <p>19 like we got ten complaints and we verified five of them?</p> <p>20 A It's in our end-of-year report. And we</p> <p>21 haven't completed it for 2019 because -</p> <p>22 Q Who does the – I'm sorry.</p> <p>23 A Who sees that?</p> <p>24 Q Yes, ma'am.</p>	<p>1 how long you keep documents?</p> <p>2 A Yes.</p> <p>3 Q How long are you to keep them?</p> <p>4 A Seven years.</p> <p>5 Q And do you follow those policies?</p> <p>6 A Very much, yes.</p> <p>7 Q So you should at least have information going</p> <p>8 back seven years?</p> <p>9 A We have it from the inception.</p> <p>10 Q Okay. Does this chart contain just the ones</p> <p>11 that you've done actual investigations for?</p> <p>12 A No, it's everything.</p> <p>13 Q It's everything. And are there some times</p> <p>14 when you don't end up doing investigations?</p> <p>15 A Yes.</p> <p>16 Q What kind of circumstances would those be?</p> <p>17 A When a complainant withdraws the complaint,</p> <p>18 the parties agree, respondent/complainant, that the</p> <p>19 situation reported or their account is different than what</p> <p>20 they initially reported. Various circumstances.</p> <p>21 Some complaints are filed on behalf of</p> <p>22 complainants, and the complainant may say I have no clue what</p> <p>23 they're speaking about or why they filed this complaint on</p> <p>24 my behalf.</p>